

Comment #100—10/29/2020—2:05 p.m.

My response to the USQS draft revisions exposed for comment on September 2, 2020 are provided below.

In summary I support the objective, independent and effective strengthening of Diversity Equity and Inclusion within the US Actuarial profession's self-regulating foundational documents.

The US Actuarial Profession's Code of Conduct does not include the word "diversity" nor "inclusion". These words also do not appear in the US Qualification Standards. Objectively this could be viewed as a glaring gap in the US Actuarial profession's self-regulating foundational documents. Especially given the current efforts by regulators and actuarial employers alike to reinforce the importance of DE&I following tragic events during this year.

While an independent read of the Code of Conduct could conclude that Precept 1 is broad enough to permit DE&I related acts which reflect "...adversely on the actuarial profession.." to be addressed via the Actuarial Board on Counseling and Discipline process this does not adequately address prevention or education.

In order to strengthen the effectiveness of our Code of Conduct I recommend that we explicitly require at least 1 CE hour in DE&I related training to satisfy the CPD requirements, or otherwise modify the US Actuarial Profession's self-regulating foundational documents to ensure that DE&I is a part of our professional foundation, rather than an option.

In closing I will state the obvious, actuaries are people too. Thus we have biases like everyone else. However, given the potential impact of actuarial opinion, position and performance on policy, financial or resource decisions our professionalism should demand that we are trained to minimize potential negative DE&I related outcomes.

Thank you for considering my comments.

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